

REFER TO: DJJ-1228  
 AZD 981 425 010  
 AZD 020 132 502  
 AZD 980 816 276

June 24, 1986

Mr. Michael Feeley  
 Chief, RCRA Programs Section  
 US EPA Region IX  
 215 Fremont Street  
 San Francisco, California 94105

Dear Mr. Feeley:

This letter is in followup to a telephone conversation I had with Eve Levin of your office on June 16, 1986, regarding EPA I.D. numbers for two (2) Talley Defense Systems locations.

We have EPA I.D. No. AZD020132502 assigned to our Plant #1 at 4551 East McKellips Rd. We have no EPA I.D. No. assigned to our Plant #2 at 4111 N. Higley Road. When we originally submitted a part A on December 8, 1980, Plant #2 was not contiguous with Plant #1 but Plant #2 had no street address. We were burning waste propellant/explosives in the open, which is permissible under 40 CFR 265.382, at Plant #2.

Because there was no street address for Plant #2, we listed the only address we had, 4551 East McKellips Road, the address for Plant #1. We did provide the latitude and longitude for the burn pits, so the actual location of the burn pits at Plant #2 was on the Part A. In 1980, Plant #1 was a small quantity generator and no EPA I.D. Number was necessary for Plant #1, consequently, the Part A permit application was submitted for the open burning of waste propellant occurring at the Plant #2 burn pit sites that were located by latitude and longitude on page 5 of the permit application. However, in 1985, Plant #1 accumulated hazardous waste in excess of the 1,000 kilogram accumulation limit and, therefore, became subject to the notification requirement. Also, by 1985, Plant #2 had been assigned an address, 4111 N. Higley Road. In 1985, we began manifesting wastes from both plants using the I.D. No. AZD020132502. In 1985, I wrote an explanation of the above to the Arizona Department of Health Services and filed a revised part A and two (2) Notifications of Hazardous Waste Activity with Mr. Alan Roesler of ADHS. Mr. Roesler was satisfied and, at his suggestion, I sent the Revised Part A and two (2) Notifications of Hazardous Waste Activity to Mr. Bill Wilson of the RCRA Permits Section in San Francisco. I did not send Mr. Wilson an explanation as I thought the one explanation to Mr. Roesler would be adequate. In any event, I still have only one EPA I.D. No. (AZD020132502) assigned to Plant #1.

Please review the revised Part A and two (2) Notifications of Hazardous Waste Activity which were sent to Bill Wilson (REF: DJJ-0844, dated August 22, 1985). I had both Notifications assigned a current date and signed again as suggested by Eve Levin. Please note:

1. The Revised Part A used AZD020132502 and the newly assigned and correct address of 4111 North Higley for Plant #2 which is where the burn pits are located.
2. The Notification of Hazardous Waste Activity for Plant #2 at 4111 N. Higley Road used AZD020132502.
3. The Notification of Hazardous Waste Activity for Plant #1 at 4551 E. McKellips Road used no EPA I.D. number.

If you can possibly do so, please assign AZD020132502 to Plant #2 at 4111 N. Higley Road and issue a new I.D. number to Plant #1 at 4551 E. McKellips Road.

As I mentioned earlier, the burn pits have always been at Plant #2 at the latitude and longitude shown on the Part A. If a new I.D. number is assigned to Plant #2, I will have to file an additional revised Part A using the new I.D. number.

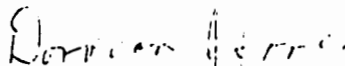
I received a letter from ADHS on June 13, 1986, stating that I must provide an EPA I.D. number for Plant #2 within 35 calendar days (July 18, 1986).

My phone number is (602) 898-2204. If you have any questions, please call me.

Please expedite so tht I can furnish ADHS an I.D. number for Plant #2 well before July 18, 1986.

Cordially,

TALLEY DEFENSE SYSTEMS, INC.



Donovan J. Jones

Director of Safety and Security

DJJ:jt

Attachments: 1) Letter to Mr. Bill Wilson (DJJ-0844) dated 8/22/85  
2) Two (2) Notification of Hazardous Waste Activity  
3) Revised Part A Permit Application, dated 8/12/85

cc: M. Betka (With Attachments)  
S. Crozier (With Attachments)  
M. Dickerson (With Attachments)  
D. Kimball (With Attachments)